

Message

From: Hanlon, Lisa [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=93E6794D6A7741BEA537BDA8ECC51CC4-HANLON, LISA]
Sent: 1/27/2020 1:52:48 PM
To: Russell.Osborne@dnr.mo.gov
Subject: FW: Tire Pyrolysis Determination

Hi Russell:

This is the response I received from EPA headquarters regarding your tire pyrolysis question.
Lisa Hanlon

Lisa Hanlon
Air Compliance
U.S. EPA Region 7
11201 Renner Blvd.
Lenexa, KS 66219
913-551-7599
hanlon.lisa@epa.gov

From: Ayres, Sara <Ayres.Sara@epa.gov>
Sent: Monday, January 27, 2020 7:11 AM
To: Modak, Nabanita <Modak.Nabanita@epa.gov>; Hanlon, Lisa <Hanlon.Lisa@epa.gov>
Subject: RE: Tire Pyrolysis Determination

I don't have anything to add. I agree more information to ensure that no combustion is occurring would be necessary. Thanks.

Sara Ayres
Air Branch
USEPA / OECA / OC / MAMPD
ayres.sara@epa.gov
(312) 353-6266

From: Modak, Nabanita <Modak.Nabanita@epa.gov>
Sent: Friday, January 24, 2020 5:27 PM
To: Hanlon, Lisa <Hanlon.Lisa@epa.gov>
Cc: Ayres, Sara <Ayres.Sara@epa.gov>
Subject: RE: Tire Pyrolysis Determination

Hi Lisa,

From the look of it (with very limited information provided to EPA), it does not look like a CISWI unit. We do need to confirm that the process is pyrolysis. We would like to get a detailed process description with a process flow diagram. If the process is proven to be a pyrolysis process (which is not combustion) and with the excess syngas getting routed to the RTO (which will trigger contained gas argument under CISWI and be exempt), then the unit will not be subject to CCCC and DDDD. I have copied Sara (from OECA) if she wants to add anything. As I said we need more information to analyze the process is truly non-combustion.

Thanks
Nabanita

From: Hanlon, Lisa <Hanlon.Lisa@epa.gov>
Sent: Thursday, January 23, 2020 10:41 AM
To: Modak, Nabanita <Modak.Nabanita@epa.gov>
Subject: FW: Tire Pyrolysis Determination

Hi Nabanita:

I haven't looked at CISWI in a while and could use a little technical help. Would the tire pyrolysis unit described below in the blue section be subject to CISWI?

Thanks for your help...

Lisa

Lisa Hanlon
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From: Osborne, Russell <Russell.Osborne@dnr.mo.gov>
Sent: Thursday, January 23, 2020 9:03 AM
To: Hanlon, Lisa <Hanlon.Lisa@epa.gov>
Subject: Tire Pyrolysis Determination

Good morning Ms. Hanlon,

My name is Russell Osborne I work for the Missouri Department of Natural Resources – Air Permitting Section. I currently have an application for the pyrolysis of tires. I have looked through old emails and comments about the subject but remain unsure of the determination.

In an old email conversation (January 4, 2017) with an former MoDNR employee I found the following response from you: " It sounds to me like the tire pyrolysis unit is not an incinerator. According to the NHSM rule, if a material is processed before burning, then it is not considered a waste. The "processing" is what turns a waste into a fuel, and apparently shredding tires (regardless of whether it's done on site or somewhere else) is considered to be "processing" the material into a fuel. Therefore, this pyrolysis unit couldn't be an incinerator because the CAA defines an incinerator as something that burns *any solid waste*."

The current proposed process I am working on does not process the tires. The company loads whole used tires into the pyrolysis reactor. Collected vapor is condensed to synoil. Non-condensable vapor (syngas) is indirectly fired to heat the chamber. Excess syngas is directed through an RTO onsite. Syngas is not sold offsite. Does this make the process a solid waste incinerator and applicable to CISWI?

If there is more information needed to help please do not hesitate to let me know!

Thank you,

Russell Osborne, E.I.T.

Missouri Department of Natural Resources

Air Pollution Control Program

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